

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

**L. M.**, a minor by and through his father  
and stepmother, Christopher and Susan  
Morrison,

*Plaintiff,*

v.

**TOWN OF MIDDLEBOROUGH;  
MIDDLEBOROUGH SCHOOL  
COMMITTEE; CAROLYN J. LYONS,**  
Superintendent of the Middleborough  
Public Schools, in her official capacity;  
and **HEATHER TUCKER**, acting  
Principal of Nichols Middle School, in  
her official capacity,

*Defendants.*

Case No.: 23-cv-11111-IT

**MOTION FOR ADMISSION *PRO*  
*HAC VICE* OF DAVID CORTMAN**

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**MOTION FOR ADMISSION *PRO HAC VICE* OF DAVID CORTMAN  
(WITH DECLARATION OF DAVID CORTMAN)**

Pursuant to Local Rule 83.5.3, the undersigned moves this Court for an order permitting David Cortman to appear and participate *pro hac vice* in this action on behalf of Plaintiff L.M. David Cortman is an attorney with Alliance Defending Freedom, 1000 Hurricane Shoals Rd NE, Suite D-1100, Lawrenceville, GA 30043 telephone (770) 339-0774, email [dcortman@adflegal.org](mailto:dcortman@adflegal.org). David Cortman specializes in First Amendment litigation.

David Cortman is a member in good standing of the Bar of the State of Georgia (Bar Registration Number 188810) and every other state in which he has been admitted to practice. Furthermore, he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

David Cortman does not appear on any list of attorneys disqualified to appear in the aforementioned courts or any other courts of record. Neither is he the subject of any pending disciplinary proceedings nor has he ever been disciplined by any state bar or disciplinary committee.

Accordingly, it is respectfully requested that David Cortman be admitted *pro hac vice* to appear as counsel on behalf of Plaintiff L.M. in this matter.

Respectfully submitted this 19th day of May, 2023.

*s/ Andrew Beckwith*

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Andrew Beckwith  
MA Bar No. 657747  
MASSACHUSETTS FAMILY INSTITUTE  
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*Attorney for Plaintiff*

**DECLARATION OF DAVID CORTMAN  
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to 28 U.S.C. § 1746, I, David Cortman, declare that

1. My name, office address, and telephone number are as follows:  
  
David Cortman  
Alliance Defending Freedom  
1000 Hurricane Shoals Rd NE,  
Suite D-1100  
Lawrenceville, GA 30043  
Telephone: (770) 339-0774
2. I have been admitted to the Georgia State Bar.
3. I am a member of the bar in good standing in every jurisdiction in which I am admitted to practice.
4. I certify that I am not the subject of disciplinary proceedings pending in any jurisdiction in which I am a member of the bar.
5. I certify that I have not previously had a *pro hac vice* admission to this court revoked for misconduct.
6. I have read and agree to comply with the Local Rules of the U.S. District Court for the District of Massachusetts.
7. I certify my understanding of Federal Rule of Civil Procedure 5.2(a).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of May, 2023.

s/ David Cortman  
David Cortman

**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2023, I electronically filed the foregoing using the CM/ECF system, and will serve the same via email with Plaintiff's Verified Complaint on Counsel for the following parties:

Gregg Corbo  
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*Counsel for*  
**Town Of Middleborough**

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*Counsel for*  
**Middleborough School Committee**  
**Carolyn J. Lyons**  
**Heather Tucker**

Dated: May 19, 2023

*s/Andrew Beckwith*

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Andrew Beckwith

*Attorney for Plaintiff*